

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

**TRINIDAD GONZALEZ, individually and on
behalf of others similarly situated,**

Plaintiffs,

– against –

**ALLIED CONCRETE INDUSTRIES INC.,
ALLIED CONCRETE STRUCTURES, INC.,
AMERICO MAGALHAES, and MANUEL
MAGALHAES,**

Defendants.

Case No.: 14-CV-04771(JFB)(AKT)

PROPOSED SCHEDULING ORDER

A. KATHLEEN TOMLINSON, Magistrate Judge:

I. DEADLINES AND COURT APPEARANCES

Deadline for completion of Initial Disclosures
required by Rule 26(a):

October 28, 2014

First request for the production of documents
and first request for interrogatories due by:

December 2, 2014

Responses to first request for production
of documents and first set of interrogatories
due by:

January 15, 2015

Deadline for joinder of additional parties
and amendment of pleadings:

January 27, 2015

Status Conference:

March 17, 2015 at TBD

II. CHECKLIST FOR THE COURT

A. Initial Disclosures: Counsel confirm that the Initial Disclosures have been served:

Plaintiff:

☒ Yes ☐ No

Defendants:

☒ Yes ☐ No

B. Stipulation and Order of Confidentiality: Counsel confirm that they have consulted in good faith regarding the need for such an order:

☒ Yes ☐ No

Based on the consultation, counsel find that a Stipulation and Order of Confidentiality is:

☒ Needed ☐ Not needed

C. Electronically Stored Information (“ESI”): Counsel confirm that they have met and conferred regarding the existence of any relevant ESI on both sides:

☒ Yes ☐ No

The parties have had some preliminary discussion about the type of ESI which is in their clients’ respective possession or control and how they wish to have such ESI produced:

☒ Yes ☐ No

Based on those discussions, counsel are advising the Court that the relevant ESI consists of:

1. Payroll records

2. _____

3. _____

4. _____

5. _____

D. HIPAA Release Authorizations: Counsel confirm that such authorizations for this case are:

☐ Needed

☒ Not needed

SO ORDERED:

Dated: Central Islip, New York

A. KATHLEEN TOMLINSON
United States Magistrate Judge